

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 4:18-CR-241
	§	Judge Crone
SATHISH KUMAR PURAM (1)	§	
	§	

**ELEMENTS OF THE OFFENSE**

Defendant **Sathish Kumar Puram** is charged in Count One of the Information with a violation of 18 U.S.C. § 371 (Conspiracy to violate 18 U.S.C. §§ 1030(a)(2)(C) and (c)(2)(A)). The elements of the offense are as follows:

1. The defendant and at least one other person made an agreement to commit the crime of intentionally accessing a computer without authorization or in excess of authorized access, and thereby obtain information from any protected computer;
2. The defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose; and
3. One of the conspirators during the existence of the conspiracy knowingly committed at least one overt act, in order to accomplish some object or purpose of the conspiracy.

Respectfully submitted,

JOSEPH D. BROWN  
United States Attorney

By: /s/ Ryan K. Dickey

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**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served by electronic mail to counsel of.

On this 20th day of May, 2019.

/s/ Ryan K. Dickey

Ryan K. Dickey  
Trial Attorney